

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ENVIGO RMS, LLC,

Defendant.

Case No. 6:22-00028-NKM

JOINT MOTION FOR EXTENSION OF TIME

The Court's June 27, 2022 Order extended the parties' deadline to submit a joint transfer plan to 5:00 pm on Wednesday, June 29, 2022. ECF No. 30. The parties respectfully move the Court for an additional extension of this deadline.

The parties are continuing to discuss the terms of a joint transfer plan. And, Envigo's motion for reconsideration of the Court's June 27, 2022 order clarifying its preliminary injunction order, ECF No. 31, and the United States' opposition to the motion for reconsideration, ECF No. 32, are pending before the Court. A ruling on this motion will affect the number of beagles that can be transferred from the Cumberland Facility by fulfilling existing contracts. Because the joint transfer plan depends in part on the number of beagles Envigo is permitted to transfer by fulfilling existing contracts, the parties respectfully request that the Court extend the parties' deadline to submit a joint transfer plan until 48 hours after the Court's resolution of the motion currently pending before the Court.

DATED: June 29, 2022

Respectfully Submitted,

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